

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PHILIP M. REIS,

Defendant.

CASE NUMBER 20-MJ-7134-MAB

FILED UNDER SEAL

CRIMINAL COMPLAINT

I, Jacob Frechette, Special Agent with the Federal Bureau of Investigations, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1
ATTEMPTED ENTICEMENT OF A MINOR

On or about June 26, 2020, the defendant, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

PHILIP M. REIS,

defendant herein, using facilities of interstate commerce, that is a cellphone connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity under such circumstances as would constitute a criminal act under 720 ILCS 5/11-1.60(d) (Aggravated Criminal Sexual Abuse), in violation of 18 United States Code, Section 2422(b).

AFFIDAVIT

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) assigned to the FBI's Springfield Division, Fairview Heights Resident Agency, in Fairview Heights, Illinois. I have been employed by the FBI since January 2019. My employment has vested me with the authority to investigate violations of federal law, including Title 18, U.S.C. §§ 2252, 2252A, and 2422, all involving the Sexual Exploitation and Other Abuse of Children. During my time at the FBI Academy and while working the violation, I have received training in a variety of investigative and legal matters, including topics of searches, drafting search warrant Affidavits, and Probable Cause. I am presently assigned to the Springfield Violent Crimes Against Children Squad, which focuses on investigating individuals and dismantling organizations responsible for the sexual exploration of children through the manufacture and distribution of child pornography. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. In connection with such investigations, I have served as case agent, have been the affiant for several search warrants and I have conducted interviews of subjects, victims, and witnesses. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being

submitted for the limited purpose of securing a criminal complaint and an arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that PHILIP M. REIS committed violations of Title 18, United States Code, Section 2422(b).

4. On June 26 and 27, 2020, agents from the Federal Bureau of Investigation, along with a joint taskforce of various state and federal law enforcement agencies conducted an undercover investigation targeting subjects who were attempting to engage in sexual activity with minors.

5. Starting on approximately June 19, 2020, through June 26, 2020, undercover agents began posting ads on various online social media and dating platforms and applications. The ads were primarily dating profiles showing photos of young-looking male and female adult confidential sources. The ads all state that the person's age is 18 as that is the minimum age required for the websites.

6. A residence in Collinsville, Illinois was obtained to be the FBI Online Covert Employee ("OCE") location that targets were directed to for the purpose of engaging in sexual activity with the fictitious minors from the online profiles.

7. On June 26, 2020, a Special Agent with FBI, acting in authorized undercover capacity, was operating a profile on a popular online dating/chatting application. The FBI Online Covert Employee ("OCE") profile displayed an age of eighteen (18) years old. The OCE user profile was "Just Looking" and included two pictures of a male cooperating witness's face.

8. On June 26, 2020, at approximately 9:39 a.m. a target user with the name "Oliver?", later identified as REIS, initiated a message conversation with the OCE profile "Just Looking."

The target profile showed a picture of an adult male wearing a blue shirt, who lives in O'Fallon, Illinois. The OCE responded to the message, and a short time later, this excerpt of conversation occurred:

REIS: Hi
OCE: Hi
REIS: How's it going
OCE: Good
REIS: Me too just bored and horny
REIS: [two pictures sent of a male abdomen with an erect penis.]

9. During the course of the chat, the OCE revealed that he was a minor making multiple statements, including: "My mom will be gone around 5 and i'll be home alonr", "Would u still be interested in hooking up if I were a little younger than my profile", "15", "Lol. You nailed it. I can't find any guys my age to hookip with and they talk to much" and "Made it. I'll let you know when gma leaves."

10. REIS responded to the OCE's admission of being 15 years old with multiple statements, including:

REIS: Wow you look older
....
REIS: It's cool I remember being 15 and horny all the time

11. REIS indicated his interest in a sexual encounter, and the following excerpt of conversation occurred:

OCE: I live in Collinsville. I'm just visiting my gma. She's getting ready to take me home. My mom is in Kentucky.

REIS: I so can't wait to see and you cock

REIS: And taste it

REIS: When will she be home

OCE: Me to. I'm really excited about it. You probably need to bring more than one condom

OCE: Tomorrow

REIS: K

REIS: So you will be home alone (Devil emoji) right

REIS: And just an FYI we didn't have an internet thing up on when I was your age.

REIS: So lube wasn't in our vocabulary

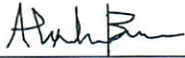
REIS: Quickly learned about Vaseline

12. During the conversation, a plan was set to meet later that day at the OCE residence. On June 26, 2020, at approximately 6:15 p.m., REIS arrived at the OCE residence and approached the front door. Agents approached REIS at the front door of the residence and took him into custody. Law enforcement were able to identify the target profile photo of the adult male as REIS. REIS declined to make a statement. A cellular phone was seized from REIS' person.

13. Based on the foregoing, I submit that there is probable cause to believe on June 26, 2020, PHILIP M, REIS, used a facility and means of interstate commerce, specifically his cellular telephone, and knowingly attempted to persuade, induce, and entice an individual who had not attained the age of 18 years, to engage in a sexual activity for which a person could be charged in violation of 18 U.S.C. 2422(b).

Jacob Frechette
Special Agent, Federal Bureau of Investigation

STEVEN D. WEINHOFER
United States Attorney



Alexandria M. Burns
Assistant United States Attorney

Subscribed and sworn to before me this 27th day of June, 2020, within the
Southern District of Illinois.



~~Mark A. Beatty~~
~~United States Magistrate Judge~~

Jacob Frechette
Special Agent, Federal Bureau of Investigation



U.S. Magistrate Judge